

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

John Christopher Smith,)	CASE NO. 4:15-CV-04612-BHH-TER
)	
Plaintiff,)	
)	
vs.)	ANSWERS TO LOCAL RULE 26.01
)	INTERROGATORIES
Ernest J. Edwards, individually,)	
Bobby Paul Edwards, individually,)	
and Half Moon Foods, Inc. d/b/a J&J)	
Cafeteria,)	
)	
Defendants.)	
_____)	

Pursuant to Rule 26.01 of the Federal Rules of Civil Procedure, the Defendants, **Ernest J. Edwards, individually and Half Moon Foods, Inc. d/b/a J&J Cafeteria**, answer Local Rule Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

None.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER:

Jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER:

Plaintiff filed the claim in this Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

A related criminal action is pending in state Court against Defendant Bobby Paul Edwards.

(F) [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

These Defendants are properly identified.

(G) [Defendants only.] If you contend that some or other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER:

Not applicable.

KELAHHER, CONNELL & CONNOR, P.C.

s/Gene M. Connell, Jr.

Gene M. Connell, Jr. (Fed. I.D. No. 236)

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January 28, 2016

Surfside Beach, South Carolina.